

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

B.P., H.A., and S.H., individually,  
and on behalf of all others  
similarly situated,  
Plaintiffs,

VS.

CITY OF JOHNSON CITY, TENNESSEE;  
KARL TURNER, individually, and in his  
official capacity as Chief of the  
Johnson City Police Department;  
KEVIN PETERS, individually, and in his  
official capacity as Captain in the  
Johnson City Police Department;  
TOMA SPARKS, individually, and in his  
official capacity as Investigator in  
the Johnson City Police Department;  
JUSTIN JENKINS, individually, and in  
his official capacity as Investigator  
in the Johnson City Police Department;  
JEFF LEGAULT, individually, and in his  
official capacity as Investigator in  
the Johnson City Police Department;  
BRADY HIGGINS, individually, and in his  
official capacity as Investigator in  
the Johnson City Police Department;  
and DOES 8-20, inclusive,  
Defendants.

CASE NO.  
2:23-cv-00071-TRM-JEM

PRETRIAL DISCOVERY DEPOSITION OF

H. A.

(Taken May 21, 2024)

\*\*\*THIS STYLE PAGE CONTINUES\*\*\*

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**COURT REPORTING AND VIDEO SERVICES**

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15 Q. Based on the allegations in the complaint, you alleged  
16 that you were sexually assaulted by Williams in September  
17 or October of 2020. Is that fair?  
18 A. That's correct, yes.

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20 Q. When was the last time you went to Sean Williams' condo?  
21 A. October 18th, 2020.  
22 Q. And do you approximately know the first time you went to  
23 Sean Williams' condo?

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1 A. Again, I am not the one with this knowledge. That's not  
2 part of the class that I am representing, so I don't have  
3 that knowledge.  
4 Q. So the answer to that is you don't know what Turner did to  
5 participate or in furtherance of this sex trafficking  
6 venture?  
7 A. That would be accurate, yes.  
8 Q. What about Toma Sparks?  
9 MS. KRAMER: Object to form.  
10 A. Again, I would -- my statement would be the same.  
11 Q. Which is you don't -- you don't have any information  
12 regarding his participation in the sex trafficking  
13 venture.  
14 A. Correct.  
15 Q. What about Kevin Peters?  
16 A. I also do not know of their involvement in the sex  
17 trafficking venture.  
18 Q. Justin Jenkins?  
19 A. That is the same as them all.  
20 Q. Jeff Legault?  
21 A. Again, the same.  
22 Q. Brady Higgins?  
23 A. The same. I want to make some more tea in a minute.  
24 MS. BAEHR-JONES: I think we might need to take a break.  
25 MS. KRAMER: Emily, when you...

H. A.

DIRECT - TAYLOR

1 conference?

2 MR. LAKEY: We would like to talk about this before we break  
3 just to make sure.

4 MS. BAEHR-JONES: Yeah, let's go off.

5 \*\*\*OFF THE RECORD\*\*\*

6 \*\*\*ATTORNEY EYES ONLY\*\*\*

7 DIRECT EXAMINATION CONTINUES BY MS. TAYLOR:

8 COURT REPORTER: We went off the record at 12:53. The time is  
9 now 12:57, and we are back on the record.

10 Q. <sup>H. A.</sup>  you testified that when you left Williams'  
11 condo, you made some phone calls. I believe you testified  
12 you called your fiancé. What did you tell your fiancé?

13 A. I told him what happened or I told him what I thought  
14 happened. I said, I think this happened to me. I kind  
15 of, you know, not in as much detail as in a deposition,  
16 but I told him probably some vulgar statements. I told  
17 him that I was assaulted by Sean and that I was confused  
18 and I'm, like, wondering if it had happened or not. You  
19 know, questioning my -- questioning myself, talking it  
20 through with my -- with my now husband at the time, yeah.

21 Q. Okay. And you called your sister, <sup>Female 9</sup>

22 A. Surely, yeah.

23 Q. Well, did you? Do you remember calling your sister?

24 A. Oh, yeah. Oh, yes, yes, yes, I did.

25 Q. Okay. And what did you tell your sister?

H. A.  
ATTORNEY EYES ONLY

DIRECT - TAYLOR

21 Q. Okay. And you called your sister, *Female 9*

22 A. Surely, yeah.

23 Q. Well, did you? Do you remember calling your sister?

24 A. Oh, yeah. Oh, yes, yes, yes, I did.

25 Q. Okay. And what did you tell your sister?

H. A.  
ATTORNEY EYES ONLY

DIRECT - TAYLOR

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1 A. Probably the same thing.

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20 A. Can I take a break?

21 MR. RADER: Before you do, can I just ask you one more  
22 question, please? So while we've got everybody out...

23 A. I'm sorry, but aren't I allowed to ask for a break? And  
24 if you ask me a question, I have to answer it, and I would  
25 like a break now, please.

H. A.

DIRECT - TAYLOR

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1 MS. BAEHR-JONES: Yes.

2 COURT REPORTER: It's 5:14, and we're off the record.

190

1 Q. And we've talked about that. So now I am talking about  
2 the actual what has been described in the complaint as the  
3 extortion scheme that Sean Williams, or someone associated  
4 with him, was paying off JCPD officers. Is that what you  
5 understand the extortion scheme to be?

6 A. Correct.

7 Q. All right. When did you first learn about that?

8 A. When did I first learn about the extortion scheme? I  
9 can't recall when I -- when I was able to realize that the  
10 money going missing was associated with the misdeeds of  
11 the police department, so I don't have a solid answer for  
12 you on that specifically about a time frame. It would  
13 depend on when statements had been made, or information  
14 had been, or evidence had been discovered that there were  
15 issues with the behavior associated with the police having  
16 money of Sean's in their possession that was not -- they  
17 weren't supposed to have.

18 Q. And I know Sean Williams told you about the money that he  
19 says was taken from his safe.

20 A. Uh-huh (Affirmative).

21 Q. So you learned that from him. These other details about  
22 someone associated with Sean Williams, Alunda Rutherford  
23 or Sean Williams, paying off the JCPD cops, who did you  
24 learn that from?

25 MS. KRAMER: Objection.

H. A.

DIRECT - BEREXA



1 A. I don't recall.

2 Q. Okay. You agree with me, you don't have -- you, as you

3 sit here, don't have any firsthand knowledge. You never

4 saw that occur, correct?

5 MS. KRAMER: Objection.

6 A. I never saw what occur?

7 Q. You never saw -- let's be very specific. You never saw my

8 client, Toma Sparks, receive money from Sean Williams,

9 correct?

10 MS. KRAMER: Objection.

11 A. I think I testified earlier that I don't know that.

12 Q. Okay. Well, let me ask it this way. Until today, you

13 didn't know what Toma Sparks looked like, correct?

14 A. I think that's a fair statement.

15 Q. Okay. So if you didn't know what he looked like, you

16 would not have known that Toma Sparks was receiving money

17 at any point in time from JCPD officers or, I mean, from

18 Sean Williams, correct?

19 A. Correct.

20 Q. So you have no firsthand knowledge of that.

21 MS. KRAMER: Objection.

22 A. To my recollection, no.

23 Q. Okay. And again, other than your attorneys, are you

24 telling me you don't recall who else has told you about

25 this alleged extortion scheme?

H. A.

DIRECT - BEREXA

19 Q. Do you know who Kevin Peters is?  
20 A. I believe he's the officer here, one of the officers here.  
21 Q. All right. Do you know anything that he has done with  
22 respect to Sean Williams at all?  
23 A. Specifically him?  
24 Q. Yeah.  
25 A. I do not know. That's not my job to know, so I would say

H. A.

DIRECT - RADER

1       that would be something my lawyers would know. I don't  
2       specifically know that information, those details about  
3       him.

4   Q. All right. As we sit here today, you can't say anything  
5       about Mr. Peters as to what he has done or hasn't done,  
6       what he should have done, anything about him personally,  
7       can you?

8   MS. KRAMER: Objection.

9   A. I'm sorry, can you repeat that question?

10   Q. Sure. You can't -- as we sit here today, you can't say  
11       anything about Mr. Peters, what he did do, what he didn't  
12       do, what he should have done, anything about him  
13       personally. Is that correct?

14   MS. KRAMER: Objection.

15   A. In regards to what?

16   Q. About Sean Williams or any of the allegations in the  
17       second amended complaint.

18   MS. KRAMER: Objection.

19   A. Again, I feel like the question is too broad for me to  
20       provide an answer to.

21   Q. Can you identify a single thing that Kevin Peters did  
22       wrong?

23   A. Broke the law.

24   Q. All right. What law do you say that Kevin Peters broke?

25   A. I don't know the law.

H. A.

DIRECT - RADER

1 Q. What is it that you say that Kevin Peters did that you say  
2 broke the law?

3 A. As I stated earlier, the extortion involving Sean Williams  
4 with the money issues.

5 Q. All right. What is the basis for you to say that Kevin  
6 Peters was involved in any extortion involving Sean  
7 Williams, that individual?

8 A. That is not my job to explain. That is my lawyers' job.

9 Q. Do you have any basis that you can say as you sit here  
10 today as the Plaintiff in this lawsuit to say that  
11 Kevin Peters personally was involved in any extortion  
12 scheme?

13 MS. KRAMER: Objection.

14 A. I can say that the Johnson City Police Department did.

15 Q. Okay. Can you identify any witness to say that Kevin  
16 Peters personally did anything to be involved in any  
17 extortion scheme or otherwise did anything wrong as  
18 alleged in your complaint?

19 MS. KRAMER: Objection.

20 A. Okay, the question one more time. I apologize.

21 Q. Can you identify any witness as you sit here today who can  
22 say that Kevin Peters did anything personally wrong, or  
23 was involved in an extortion scheme, or did anything  
24 that's improper as described in your second amended  
25 complaint?

H. A.

DIRECT - RADER

1 MS. KRAMER: Objection.

2 Q. Any witness at all? Can you name one?

3 MS. KRAMER: Objection.

4 A. At this time, I'm not certain.

5 Q. When are you going to be certain?

6 MS. KRAMER: Objection.

7 A. When the evidence is provided and through discovery.

8 Q. So you don't -- you can't name a single witness today.

9 Can you provide a single document today?

10 MS. KRAMER: Objection.

11 A. That is not my responsibility. It is the responsibility

12 of my lawyers.

13 Q. Okay. So the answer is no, you can't identify a single

14 document today. Is that correct?

15 MS. KRAMER: Objection.

16 A. I would not say that's factual. I can say that I'm not

17 certain at this time.

18 Q. Can you identify any individual, a Johnson City Police

19 Department officer, who -- who was involved in an

20 extortion scheme? Can you name one?

21 A. The men sitting here that have been -- we have claimed in

22 the statements.

23 Q. Do you even know who these people are?

24 A. I know who the Johnson City Police Department is.

25 Q. So your -- your allegations are broad against the Johnson

H. A.

DIRECT - RADER

1 City Police Department, but you can't name anything about  
2 any individual person. Is that right?

3 MS. KRAMER: Objection.

4 A. I believe there is evidence that provides that  
5 identification for those crimes.

6 Q. And I'm asking you, Ms. H.A. as the Plaintiff in this  
7 lawsuit, can you identify any fact about any individual  
8 Johnson City Police officer that that person did something  
9 wrong, was involved in an extortion scheme, or did  
10 anything improper as in your second amended complaint?

11 MS. KRAMER: Objection and this...

12 Q. Can you name them?

13 MS. KRAMER: ...this has gone on -- this has been asked and  
14 answered so many times, I will instruct the witness not to  
15 answer.

16 Q. There's a specific court order that says that you cannot  
17 do that. Do you want to violate that court order?

18 MS. KRAMER: I know exactly the court order.

19 Q. And it says the only instruction that you can give is if  
20 it's privileged.

21 MS. KRAMER: It's a short -- well, okay, I can go to the court  
22 if you want to do that. I can call.

23 Q. Are you going to terminate the deposition?

24 MS. KRAMER: We can...

25 Q. Just answer the question, Ms. H.A.

H. A.

DIRECT - RADER

1 MS. KRAMER: If you would like to -- you have asked the same  
2 question ten times.

3 Q. No, I have broadened it.

4 MS. KRAMER: And you're asking it improperly on a number of  
5 bases, so if you -- you can answer one more time. If you  
6 want me to terminate, then we can deal with that when we  
7 do.

8 Q. Can you -- can you identify any fact personally about any  
9 Johnson City Police officer that you claim that these  
10 individuals did wrong, or were involved in an extortion  
11 scheme, or anything else as alleged in your complaint?

12 MS. KRAMER: Objection.

13 A. Again, I believe that the facts are in the filing that has  
14 been provided.

15 Q. And there are no facts that are not in the filing that you  
16 know of.

17 A. False. That's false.

18 Q. And so that's the question. What facts do you know of  
19 that are not in the filing that you claim that any of  
20 these individuals, not just some broad scattershot Johnson  
21 City Police Department, but any of these individuals, can  
22 you tell me any facts that are not in your filing?

23 MS. KRAMER: Objection.

24 A. I cannot tell you any facts that are not in the file.  
25 That is the responsibility of my lawyers as well as other

H. A.

DIRECT - RADER

1 Defendants in this case.

2 Q. Okay. And can you identify any witnesses about any of  
3 these facts that you've said are not in the filing?

4 A. It's possible.

5 Q. I'm asking you right now can you name a single witness?

6 A. At this time, no, I cannot name them at this time.

7 Q. Okay. Can you identify a single document at this time?

8 MS. KRAMER: Objection.

9 A. I'm not certain.

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C E R T I F I C A T E

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of H. A. was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 3rd day of June, 2024.



*Rebecca Overbey*

Rebecca Overbey  
LICENSED COURT REPORTER  
State of Tennessee  
LCR #078

My License Expires:

June 30, 2026

\*\*\*CERTIFIED ONLY IF AFFIXED SEAL IS GREEN\*\*\*